

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

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Woodstone Limited Partnership;  
Lofts at Farmers Market LLC,  
  
Plaintiffs,

Case No. 22-CV-1589 NEB-JFD

v.

City of Saint Paul, Minnesota, a Minnesota  
Charter City; City Council of the City of  
Saint Paul; Angie Wiese, in her official  
capacity as the Director of the Department  
of Safety and Inspections of the City of  
Saint Paul; Mayor Melvin Carter, in his  
official capacity as Mayor of the City of  
Saint Paul; and John Doe,  
  
Defendants.

**SUPPLEMENTAL DECLARATION  
OF LISA MOE IN SUPPORT OF  
PLAINTIFFS' OPPOSITION TO  
DEFENDANTS' MOTION FOR  
SUMMARY JUDGMENT AND REPLY  
IN SUPPORT OF PLAINTIFFS'  
MOTION FOR SUMMARY  
JUDGMENT**

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I, Lisa Moe, declare and state as follows:

1. I am President and Chief Executive Officer of StuartCo, a Minnesota corporation. I have personal knowledge of the facts set forth in this declaration, and I am competent to testify about them. I submit this Supplemental Declaration in Support of Plaintiffs Woodstone Limited Partnership and Lofts at Farmers Market LLC's Opposition to Defendants' Motion for Summary Judgment and Reply in Support of Plaintiffs' Motion for Summary Judgment.


2. The building that Woodstone operates as rental units on the Woodstone property (the “Woodstone building”) was developed in 1984, therefore making the Woodstone building almost 40 years old.

3. Older buildings such as the Woodstone building become progressively more costly to maintain as they age. For example, when renovations are conducted on such older buildings, property owners must also simultaneously pay for updates to comply with new building codes. Given the age of the Woodstone building coupled with these requirements, the Rent Stabilization Ordinance adversely impacts Woodstone’s ability to renovate and maintain the Woodstone property while also complying with local building codes.

4. As President and CEO of Stuartco, the management company for Woodstone, I know the Woodstone property has significantly decreased in value as a result of the Ordinance, but we would need a valuation expert to calculate the specific amount of the decrease.

**I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.**

Dated: November 28, 2022

  
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Lisa Moe

Executed in Hennepin County, Minnesota